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Office of the United States Attorney
District of Nevada
333 Las Vegas Blvd., South, Ste. 5000
Las Vegas, Nevada 89101
(702) 388-6336

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DISTRICT OF NEVADA	
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1 DANIEL G. BOGDEN
 2 United States Attorney
 3 SUSAN CUSHMAN
 4 Assistant United States Attorney
 5 333 Las Vegas Blvd., South, Suite 5000
 6 Las Vegas, Nevada 89101
 7 (702) 388-6336

5 **UNITED STATES DISTRICT COURT**
 6 **DISTRICT OF NEVADA**

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8 **UNITED STATES OF AMERICA,**

9 **SEALED CRIMINAL INDICTMENT**

10 **Case No.: 2:14-cr- 353**

11 **Plaintiff,**

12 **vs.**

13 **SALEUMKIAT KAYARATH,
 14 ARDIS VANFOSSAN,
 15 CHAYPHET VORAVONG, and
 16 JOHN TACORDA**

17 **Defendants.**

18 **VIOLATIONS:**

19 21 U.S.C. §§ 846, 841(a)(1),(b)(1)(A),
 20 (b)(1)(B, and (b)(1)(C) – Conspiracy to
 21 Distribute a Controlled Substance; 21 U.S.C.
 22 §§ 841(a)(1), (b)(1)(A),(B) and (C) –
 23 Possession with Intent to Distribute a
 24 Controlled Substance and Distribution of a
 25 Controlled Substance;
 26 18 U.S.C. § 2 - Aiding and Abetting; and
 27 18 U.S.C. §§ 1956(a)(1)(A)(i) and (h) –
 28 Money Laundering Conspiracy

29 **THE GRAND JURY CHARGES THAT:**

30 **COUNT ONE**

31 **Conspiracy to Distribute a Controlled Substance**

32 Beginning on a date unknown, but no later than on or about March 2013, and continuing
 33 up to and including October 29, 2014, in the State and Federal District of Nevada,

34 **SALEUMKIAT KAYARATH,
 35 ARDIS VANFOSSAN,
 36 CHAYPHET VORAVONG
 37 and JOHN TACORDA,**

38 defendants herein, and others known and unknown to the grand jury, did knowingly and
 39 intentionally combine, conspire, confederate and agree with individuals known and unknown to

1 distribute 50 grams or more of actual methamphetamine, a Schedule II controlled substance,
2 500 grams or more of a mixture or substance containing a detectable amount of cocaine, a
3 Schedule II controlled substance, a mixture or substance containing a detectable amount of
4 marijuana, a Schedule I controlled substance, and a mixture or substance containing a detectable
5 amount of 3,4-Methylenedioxymethamphetamine ("MDMA"), a Schedule I controlled substance
6 all in violation of Title 21, United States Code, Sections 846 and 841(a)(1), (b)(1)(A)(viii),
7 (b)(1)(B)(ii)(II), and (b)(1)(C) .

8 **COUNT TWO**

9 Possession with Intent to Distribute a Controlled Substance

10 On or about May 8, 2013, in the State and Federal District of Nevada,

11 **SALEUMKIAT KAYARATH, and**
ARDIS VANFOSSAN

12 defendants herein, aiding and abetting one another, knowingly and intentionally possessed with
13 intent to distribute 500 grams or more of a mixture or substance containing a detectable amount
14 of cocaine, its salts, optical and geometric isomers, and salts of isomers, a Schedule II
15 controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and
16 (b)(1)(B)(ii)(II) and Title 18 United States Code, Section 2.

17 **COUNT THREE**

18 Distribution a Controlled Substance

19 On or about May 14, 2013, in the State and Federal District of Nevada,

20 **SALEUMKIAT KAYARATH, and**
ARDIS VANFOSSAN

21 defendants herein, aiding and abetting one another, knowingly and intentionally distributed 50
22 grams or more of actual methamphetamine, a Schedule II controlled substance, in violation of
23 Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A)(viii).

24 ...

COUNT FOUR

Distribution of a Controlled Substance

On or about July 23, 2013, in the State and Federal District of Nevada,

SALEUMKIAK KAYARATH,
ARDIS VANFOSSAN, and
CHAYPHET VORAVONG,

defendants herein, aiding and abetting one another, knowingly and intentionally distributed a mixture or substance containing a detectable amount of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT FIVE

Distribution of a Controlled Substance

On or about November 25, 2013, in the State and Federal District of Nevada,

SALEUMKIAT KAYARATH, and
ARDIS VANFOSSAN

defendants herein, aiding and abetting one another, knowingly and intentionally distributed 3,4-methylenedioxymethamphetamine, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT SIX

Distribution of a Controlled Substance

On or about January 30, 2014, in the State and Federal District of Nevada,

CHAYPHET VORAVONG,

defendant herein, knowingly and intentionally distributed 50 grams or more of actual methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A)(viii).

COUNT SEVEN

Distribution of a Controlled Substance

On or about July 15, 2014, in the State and Federal District of Nevada,

JOHN TACORDA,

1 defendant herein, knowingly and intentionally distributed a mixture or substance containing a
2 detectable amount of cocaine, its salts, optical and geometric isomers, and salts of isomers, a
3 Schedule II controlled substance, in violation of Title 21, United States Code, Sections
4 841(a)(1) and (b)(1)(C).

5 **COUNT EIGHT**

6 Distribution of a Controlled Substance

7 On or about October 14, 2014, in the State and Federal District of Nevada,

8 **CHAYPHET VORAVONG,**

9 defendant herein, knowingly and intentionally distributed 5 grams or more of actual
10 methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States
11 Code, Sections 841(a)(1) and (b)(1)(B)(viii).

12 **COUNT NINE**

13 Money Laundering Conspiracy

14 Beginning on a date unknown, but no later than on or about May 2013, and continuing
15 up to and including October 29, 2014, in the State and Federal District of Nevada,

16 **SALEUMKIAK KAYARATH,
17 and ARDIS VANFOSSAN,**

18 defendants herein, knowing that the property involved in financial transactions, as defined in
19 Title 18, United States Code, Sections 1956(c)(4) and 1956(c)(3), affecting interstate commerce
20 represented the proceeds of some form of unlawful activity, did combine, conspire, and agree to
21 conduct such financial transactions, which, in fact, involved proceeds of specified unlawful
22 activity, that is, conspiracy to distribute a controlled substance as charged in Count One of this
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1 Indictment, with the intent to promote the carrying on of the specified unlawful activity, in
2 violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i).

3 All in violation of Title 18, United States Code, Section 1956(h).

4 **DATED:** this 29th day of October, 2014.

5 **A TRUE BILL:**

6 /S/
7 FOREPERSON OF THE GRAND JURY

8 DANIEL G. BOGDEN
9 United States Attorney

10 
11 SUSAN CUSHMAN
12 Assistant United States Attorney